



Office of Facility and Project Management

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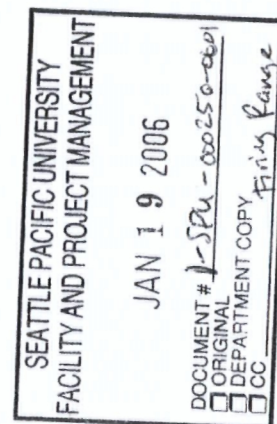
www.spu.edu

January 4, 2006

Pat Powell
Executive Director
Whidbey Camano Land Trust
765 Wonn Road, Barn C-201
Greenbank, WA 98253

RE: Casey Firing Range Soil Remediation

Dear Pat:



Overview of Remediation Work

Seattle Pacific University (SPU) contracted with Sound Environmental Strategies (Sound) and Budget Environmental (Budget) to perform consulting and soil remediation services at Camp Casey's Firing Range. Sound was responsible for oversight of the project including soil sampling, gridding, reporting and filing the Department of Ecology's (Ecology) Independent Voluntary Cleanup Action form. Budget was responsible for the excavation, trucking and disposal of contaminated soils. All bids for this project assumed that it would take five days. The initial cleanup took eleven days.

Initially, the disposal facilities told Budget that they would accept the Casey soil samples as hazardous waste. However, prior to beginning the project the same facilities notified Budget that they would no longer accept the soil samples based on the composite soil sampling results. They decided the waste stream should be considered a dangerous waste instead of hazardous waste. Because treatment, disposal and trucking of waste is controlled by the Department of Transportation, the guidelines for handling such materials are strict.

Under Sound's oversight, Budget began excavation activities at the site on September 6, 2005. A portion of the remediated soil was able to be separated out and classified as Non-Dangerous Waste. A total of 131.2 tons of soil designated as characteristic Dangerous Waste was removed from the site and transported to U.S. Ecology Idaho, Inc. (an RCRA Subtitle C landfill in Grandview, Idaho) for pretreatment prior to landfill disposal. In addition, two fifty-five gallon drums of soil designated as characteristic Dangerous Waste were properly labeled and transported to Waste Management's Subtitle D landfill in Arlington, Oregon for pretreatment prior to landfill disposal. A total of seventy-six tons of Non-Dangerous Waste soil was removed from the site and transported to the Waste Management, Inc. Alaska Street



Transfer Station in Seattle, Washington. This soil was then transferred to railcars and shipped for disposal at Waste Management's Subtitle D landfill in Arlington, Oregon.

A total of thirty confirmation soil samples were taken confirming the accuracy of the site conceptual model. The results of these samples were below the Model Toxics Control Method A Cleanup Level for unrestricted land use. Upon receiving a report of these results, Ecology issued a "No Further Action" letter to SPU on October 20, 2005.

The following week, SPU received a letter from the Environmental Protection Agency (EPA) notifying us that they had hired Herrera Environmental Consultants to conduct an independent assessment of the Casey firing range. Herrera's assessment occurred on September 20, 2005, after the initial cleanup but before the last shipment of soils. Using an on-site XRF analyzer, Herrera identified seven locations where the lead levels were above the legal limit of 250 parts per million. On November 4, 2005, Sound did a field screening of the site and took twelve samples that confirmed Herrera's findings. During this second cleanup, SPU was responsible for excavation, trucking and disposal of contaminated soil. Sound provided oversight of this work.

Sound rented an XRF analyzer during removal to ensure that samples met the cleanup criteria. Sixty-five XRF readings were taken in this effort, identifying all hotspots on the site. Twenty-nine samples were taken and analyzed to confirm the cleanup results. All identified soil was removed and placed in fifty-five gallon drums. Thirty-three drums were picked up by Philips Services for pre-treatment and disposal as dangerous waste at their facility.

Overview of Costs

The Casey Firing Range soil remediation project is now complete and project costs totaled \$130,057. Enclosed, please find a final project cost worksheet and detailed invoice backup. In addition, the following project records are enclosed:

- Independent Cleanup Action Report, dated October 11, 2005
- Island County Public Works Clearing and Grading Permit letter
- Ecology Opinion Letter Request from SPU
- No Further Action Determination from Ecology, dated October 20, 2005
- Transcribed voicemail from EPA
- Email from EPA notifying SPU of further contamination
- Supplemental Remediation acknowledgement from Ecology
- Supplemental Remedial Action Summary from Sound
- No Further Action Determination from Ecology, dated November 16, 2005

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We're still waiting for Certificates of Disposal for Manifest numbers 76953 and 51883. These will be forwarded to you once we have received them.

As previously agreed, and displayed on the enclosed summary sheet, the Whidbey Camano Land Trust is responsible for \$68,028.50 of the total project costs. Please forward a check to Seattle Pacific University in this amount.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Church', written over the word 'Sincerely,'.

David B. Church
Assistant Vice President for Facility Management

xc: Darrell Hines
Kim Johannessen

/enc